

THE LAW FIRM

FOR

TRUCK SAFETY LLP

Matthew E. Wright*
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*Board Certified as a Specialist in Truck Accident Law
by the National Board of Trial Advocacy

October 1, 2021

VIA EMAIL

Kenneth Ward
Ryan Sarr
Trammell, Adkins & Ward, PC
P.O. Box 51450
Knoxville, TN 37950

RE: *Grant Hamrick v. Nandleen Logistics, et al.*

Dear Ken and Ryan:

The purpose of this letter is to follow-up on the following late-filed exhibits marked at the depositions on September 17, 2021:

1. **Deposition of Reginald James:**

- Late-Filed Exhibit 9:** Digital copies of all videos of the accident scene taken by Defendant James.
- Late-Filed Exhibit 10:** JPEG digital files of the accident scene and/or vehicles involved in the July 27, 2020 crash taken by Defendant James.

2. **Deposition of Nandleen 30(b)(6):**

- Late-Filed Exhibit 3:** Nandleen Driver and Safety Manual.
- Late-Filed Exhibit 9:** All maintenance and repair records for the tractor Defendant James was driving on July 27, 2020.
- Late-Filed Exhibit 10:** Certified medical examination of Reginald James.
- Late-Filed Exhibit 11:** Driver's receipt of Drug and Alcohol Policy.
- Late-Filed Exhibit 20:** Copies of text messages between Defendant James and Nandleen on the date of the crash.

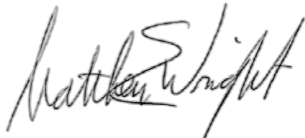
Please treat this as a formal request for these documents and digital files or let me know if you can't do so.

If we do not receive the above-listed Late-Filed Exhibits within ten (10) days of receipt of this correspondence, we will seek Court intervention.

Please feel free to contact me if you have any questions.

Sincerely,

THE LAW FIRM FOR TRUCK SAFETY, LLP

A handwritten signature in black ink, appearing to read "Matthew E. Wright". The signature is stylized with a large, looped "M" and a cursive "Wright".

Matthew E. Wright

MEW:th

From: Matthew Wright <matt@truckaccidents.com>
Sent: Tuesday, October 19, 2021 2:16 PM
To: Ken Ward <kenward@tawpc.com>
Cc: 'brad.fraser@leitnerfirm.com' <brad.fraser@leitnerfirm.com>; Traci Hannah <traci@truckaccidents.com>
Subject: Re: Nandleen & James/Hamrick (11664-051) 00557978:

Ken –

As I have received no response from you, per my good faith letter regarding your clients' outstanding discovery responses and late filed exhibits, you have left me with no choice but to file a motion to compel and for imposition of sanctions. I again followed up at the last deposition and was only told by your associate, he "had sent my letter to your clients."

I will be filing the motion as soon as it's completed.

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FOR
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Matthew E. Wright
ATTORNEY

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